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UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF TEXAS WICHITA FALLS DIVISION

In Re: §

Donna Sue Tate § Case No. 10-70026-hdh-13

§ Chapter 13

Debtor

DEBTOR'S MOTION TO EXTEND AUTOMATIC STAY

Comes Now Debtor, by counsel, and for this Motion state as follows:

- 1. Debtor filed for relief under Chapter 13 in the Northern District of Texas. This is a core proceeding.
- 2. Debtor was a debtor in a prior case during the preceding year. To-wit: Chapter 13, Case No. 08-70039-HDH-13 filed on 2/4/2008.
- 3. Debtor seeks an extension of the automatic stay imposed for 30-days pursuant to 11 U.S.C. §362(c)(3)(A), as to all creditors until further order or discharge to effectuate an orderly reorganization, pursuant to 11 U.S.C. §362(c)(3)(B).
- 4. Debtor's prior case was dismissed for: Debtor lost her job in August and was hired in August with WFISD. She could not get bring her Trustee's payment current.
- 5. The following change of circumstances demonstrate that the Debtor can perform this plan and are likely to complete the case successfully: Debtor will begin receiving \$655.00 from Social Security benefits in February 2010.

WHEREFORE, Debtor request this Court enter its order continuing the automatic stay under §362(a) in this proceeding as to all creditors for the duration of this Chapter 13 proceeding, or until such time as the stay is terminated under §362(c)(1) or (c)(2) or a motion for relief is granted under §362(d).

Respectfully submitted, /s/Monte J. White
Attorney for Debtor

CERTIFICATE OF SERVICE

A true and exact copy of the foregoing Motion and Notice of Hearing was served electronically by the ECF System or by First Class Mail on January 26, 2010 on all parties on the mailing matrix:

/s/Monte J. White
Attorney for Debtor

Case 10-70026-hdh13 Doc 6 Filed 01/26/10 Entered 01/26/10 16:09:33 Desc Main NORTHERN DISTRICT OF TEXAS Bocument Page 3 of 4 WICHITA FALLS DIVISION

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Executive Services/Radiology As: Midland Cred/Providian 1200 Austin St 8875 Aero Dr Suite 200 Wichita Falls, TX 76301 San Diego, CA 92123

Bay Area Credit Service/Bay Area Executive Services/Radiology Asa Midland Credit/Tribute 97 E Brokaw Rd Ste 240 San Jose, CA 95112

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Blair Corporation 220 Hickory St Warren, PA 16366 Executive Services/Titanium Eme: Montgomery Wards 1200 Austin St

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PO Box 785056

Capital One Auto Finance 3901 Dallas Pkwy Plano, TX 75093

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